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November 12, 2021

VIA ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

*Time to file the Joint Pre-Trial
Order extended to 1/19/22.
So ordered.*

*John G. Koeltl
U.S.D.J.
11/13/21*

Re: Angel Rivera v. City of New York et al.
No. 19-cv-00371 (JGK)

Your Honor:

I am the Senior Counsel assigned to represent defendants the City of New York, Detective Anthony Romero, Detective Joseph Davin, Detective Jason Wolfenhaut, and Detective Lahmar Sanders ("Defendants") in the above-referenced matter. Defendants write to respectfully request an extension of time to file the Proposed Joint Pre-Trial Order, currently due on November 29, 2021. This is the third request for an extension of time to file this document. This request is made with Plaintiff's consent.

The primary reason for this request is that as of November 19, 2021, the undersigned will be resigning from this office and this matter will need to be assigned to new defense counsel, who will need time to become familiar with the case file herein. As the parties still wish to continue settlement discussions prior to moving forward with further trial preparation in this matter, the requested extension will allow the new defense counsel to review this matter, to continue efforts to resolve this matter, and to prepare a Proposed Joint Pre-Trial Order for timely submission.

The parties thank the Court for its time and attention to this matter.

Sincerely,

James Jimenez
James Jimenez
Senior Counsel

Special Federal Litigation Division

cc: All Counsel (VIA ECF)